

### **Remarks and Arguments**

Claims 1-41 and 45-46 are pending. Claims 1, 2-3, 6-10, 20-23, 25, 28, and 32-34 are currently amended. Claims 45-46 are new.

- I. The Examiner rejected claims 1-41 under 35 U.S.C. 112, first paragraph, because specification does not reasonably provide enablement for part (e) of claim 1.**

Claim 1 has been amended as described above and now reads:

A surveillance system for use with a wired IP network, the system comprising:

- a camera operable for collecting and transmitting to the wired IP network digital signals in multicast protocol;
- a wireless transmitting device operable for receiving a desired signal in unicast protocol;
- a protocol translator operable to translate the desired signal from multicast protocol to unicast protocol and to forward on the wired IP network to the wireless transmitting device the desired signal in unicast protocol;
- a transmitter associated with the wireless transmitting device for transmitting a wireless signal via a wireless transmission system; and
- a portable monitoring station having a receiver associated therewith and adapted for receiving the wireless signal.

Applicants respectfully traverse the rejection of claim 1 and dependent claims 2-41 under section 112. Applicants request reconsideration in view of the amendments herein and the following remarks.

The Examiner explained that “The specification supports a protocol translator for use with a wired network connected to multiple cameras wherein the protocol receives a request through the wireless network from a portable unit.” Applicants thank the Examiner for expressing the conclusion that the specification supports claims for the multiple camera arrangement. Applicants also respectfully assert that the disclosure, including the drawings and detailed written specification including the claims as filed, provides adequate support for either single or multiple cameras as specified in claim 1 as amended, and is not limited to the Examiner’s definition set forth above. The protocol translator set forth in paragraph (e) of claim 1 is clearly and plainly described, at least, in claim 3 as originally filed. Claim 3, as originally filed, specifies: “The surveillance system of claim 1, wherein said camera is a multicast camera adapted for generating a plurality of distinctive signals and wherein the portable monitoring station is adapted for selecting from among the plurality of distinctive signals.” This passage, at least, from the original disclosure clearly provides support for claims covering a system as specified in claim 1 as amended. Accordingly, Applicants submit that the specification as filed provides adequate support for claim 1, and request reconsideration.

Next, the Examiner asserted that the term “signals” as defined in claim 1 represents “video/images obtained by a remote camera”, and that the specification does not support selecting “ones of the signals from a single camera”. The Examiner points out that the specification “only supports the selection of a video stream from a single camera”. Applicants respectfully submit that the Examiner’s position should be reversed. It is well settled that the claims form part of the specification. In the application as originally filed, claim 3 is dependent upon claim 1 and further specifies “wherein said camera is a multicast camera adapted for generating a plurality of distinctive signals and wherein the portable monitoring station is adapted for selecting among the plurality of distinctive signals” (page 17, claim 3 as filed). Nowhere in claim 1 or originally filed dependent claim 3 does any language appear that defines “signals” as requiring “video/images” or a “stream”. Claim 3 as originally filed, at least, clearly provides support for “selecting among the plurality of distinctive signals from a single camera”. As amended, claim 1, specifies that the protocol translator selects and forwards the desired signal, and “the desired signal” certainly is a subset selected from a “plurality” of signals. Applicants respectfully traverse this ground for rejecting claim 1 and request reconsideration.

The Examiner also pointed out that “the protocol translator connected to the desired ones of the signals on a wired network” is ambiguous, and goes on to explain that, although the wireless hubs are claimed, the wired network is not claimed. The Examiner asserts that this omission makes claim unclear because there is no mention of how or where the claimed wired network is connected to the rest of the system. Applicants respectfully submit that claim 1 has been amended to remove ambiguity regarding where the protocol translator is connected and, further, to specify that desired signal is selected from multicast signals on the wired IP network. In view of the amendments to claim 1, Applicants request reconsideration of this grounds for rejecting claim 1.

The Examiner also rejected claim 1 and asserted that “forwarding the desired ones of the signals to the portable monitoring station using the wired network is not supported”. Again the Examiner explains that the wired network has not been properly claimed. Applicants respectfully submit that claim 1 has been amended to remove ambiguity in this regard, and specifies that the protocol translator forwards the desired signal to the wireless transmitting device using the wired IP network. Applicants request reconsideration of this rejection in view of the amendments to claim 1.

The Examiner will note that claim 1 has been amended to eliminate various words for the purpose of clarity.

In view of the foregoing remarks and amendments to claim 1, Applicants respectfully submit that claim 1 and dependent claims 2-41 are allowable under section 112.

## **II. The Examiner rejected claims 1-41 under 35 U.S.C. 103 as being unpatentable over Courtney ‘772 in view of Hendricks ‘386.**

First, the Examiner explained that in view of the rejection under section 112, the rejection under section 103 is based on the claim as understood by the Examiner. Applicants

submit that claim 1 has been amended to remove any ambiguities pointed out by the Examiner and previously discussed above in reference to section 112.

### **Courtney '772**

Courtney '772 teaches sending images from a video camera to a computer (24), operating the computer (24) to run an image processing algorithm to initially sample about two of each thirty camera images, dithering the two selected images to reduce the pixel count in each image, and then sending the resulting low resolution images over a network which includes the internet to a portable unit. Courtney '772 clearly describes (col. 5, lines 3-8) that the algorithm selects a subset of about two frames per second from the thirty frames or so per second produced by a video camera.

In rejecting claim 1, the Examiner specifically concluded that the computer (24) of Courtney '772 is a "protocol translator" as defined in claim 1. Applicants respectfully disagree, particularly in view of the present amendments to claim 1. Claim 1 has been amended to specify that the protocol translator is:

"operable to translate the desired signal from multicast protocol to unicast protocol and to forward on the wired IP network to the wireless transmitting device the desired signal in unicast protocol."

Applicants respectfully submit that server (24) of Courtney '772 performs none of the above defined functions of the protocol translator as specified in claim 1. On the contrary, Courtney '772 does not disclose, teach or suggest that the cameras 12 or 13 can produce signals in multicast protocol, and thus computer 24 of Courtney '772 does not change the protocol of any signal from one to another, such as from multicast to unicast. The teaching of Courtney '772 contrasts significantly with the disclosure of the present application and claim 1 as amended. For example, Courtney '772 clearly fails to disclose or teach the use of any multicast signal whatsoever, and therefore does not even reach consideration of using a protocol translator as described. In direct contrast to claim 1, Courtney '772 selects one unicast signal from two available cameras each producing a unicast signal and then performs signal processing algorithms on the selected unicast signal. This type of signal processing on the images themselves is readily distinguishable from translating the protocol of a signal, such as from multicast to unicast, as specified in claim 1 as amended. Accordingly, claim 1 as amended is allowable over Courtney '772.

### **Hendricks '386**

The Examiner combines the computer (170) of Hendricks '386 with the system of Courtney '772 to reject claim 1 under section 103. In doing so, the Examiner concluded that computer (170) is a "hub" as specified in claim 1, and that combining the computer (170) with Courtney '772 renders claim 1 obvious. Applicants traverse this rejection of claim 1 as amended, and respectfully request that the Examiner reverse this specific conclusion, based upon the following arguments.

First, Applicants note that claim 1 has been amended to replace “wireless hub” with the more general element “wireless transmitting device”, of which a wireless hub is but one example.

Upon brief review, Hendricks ‘386 apparently teaches a system wherein computer (170) controls remote cameras (104) filming at a remote site (102). Information output by the cameras (104) is compressed in a compression unit (108), and the compressed audio and video are communicated over a data communication network (120) to a web site (130). At the web site (130), the video is stored in digital storage media (132) or passed to users at streamed video outputs (116). In an embodiment, computer (170) controls multiple cameras (104) (col. 9, lines 52-55) by controlling the camera motors (105). In one embodiment, analog video from the cameras (104) can be digitized and then compressed by the computer (col. 10, lines 10-15).

Applicants respectfully submit that neither the computer (170) nor any element of Hendricks ‘386 is disclosed or described to be a protocol translator which translates a desired signal from multicast protocol to unicast protocol and forwards the desired signal in unicast protocol to a wireless transmitting device.

In view of the foregoing, Applicants respectfully submit that Hendricks ‘386 does not cure the deficiencies of Courtney ‘772. Applicants submit that if computer (170) functions as “wireless hub”, or even as a “wireless transmitting device” as specified in claim 1 as currently amended, Hendricks ‘386 clearly does not cure the deficiency of a protocol translator which translates a desired signal from multicast protocol to unicast protocol and forwards the desired signal in unicast protocol to a wireless transmitting device.

Claim 1 has been amended to specify a wireless transmitting device, instead of a wireless hub. As explained previously, claim 1 has also been amended to specify that the camera is operable to output a multicast signal, and a protocol translator is adapted to translate a desired signal from multicast protocol to unicast protocol before forwarding the desired signal in unicast protocol to a wireless transmitting device associated with a wireless transmitter. As explained above, Courtney ‘772 does not disclose, teach or suggest using either a multicast signal or a protocol translator adapted to translate a desired signal from multicast protocol to unicast protocol as specified in claim 1. Hendricks ‘386 simply does not cure this deficiency of Courtney ‘772. There is no teaching or disclosure in Hendricks ‘386 that computer (170) is a protocol translator adapted to translate the format of a desired signal from multicast protocol to unicast protocol. Likewise, there is no teaching or suggestion in Hendricks ‘386 to forward a desired signal in unicast protocol to the wireless transmitting device. In view of the foregoing, claim 1 as amended and dependent claims 2-41 are allowable over Courtney ‘772 in combination with Hendricks ‘386.

**III. The Examiner rejected claims 3-7 and 31 under 35 U.S.C. 103 as being unpatentable over Courtney ‘772 and Hendricks ‘386 in view of Li ‘279 and Morad ‘244.**

### **Morad '244**

First, the Examiner explains that Morad '244 teaches a camera containing a video input processor (106) with programmable resolution (SIF, QSIF, and the like) and concludes that it would have been obvious to one of skill in the art to adjust the resolution of the video. Applicants respectfully submit that, even if it would have been obvious to one of skill in the art to adjust the camera output between alternative image resolutions, these combined references clearly do not disclose, teach or suggest a system including a protocol translator adapted to translate a desired signal from multicast protocol to unicast protocol and to forward the desired signal in unicast protocol to a wireless transmitting device. Morad' 244 thus does not cure this specific deficiency of the combination of Courtney '772 and Hendricks '386.

Further, and in the alternative, Applicants respectfully submit that, in view of the arguments set forth in the preceding paragraphs, and particularly the argument in the paragraph immediately preceeding this sentence, it would not be obvious to one of skill in the art to combine Morad '244 with Courtney '772 and Hendricks '386. Neither Courtney '772 nor Hendricks '386 contains any motivation to use a camera with programmable resolution.

### **Li '279**

In reaching this rejection, the Examiner also concludes that Li '279 teaches a transcoding method in which video output is selected based on the capabilities of a portable monitoring device, so that the video can be viewed on different devices, and further that it would be obvious to one of skill in the art to combine Li '279 with the other three references. Applicants respectfully traverse this ground for rejecting claim 1 and respectfully request the Examiner to reverse this conclusion based upon the following arguments.

First, Li '279 clearly does not disclose, teach or suggest video output from a camera in any context. Li '279 teaches that the subject video is part of a web page, and certainly not video output from a camera. Therefore, Applicants respectfully submit that one of skill in the art would not be motivated to consult Li '279 for any purpose.

Second, Applicants submit that even consulting Li ' 279, one would not consider the subject matter of transcoding web pages to be displayed on different devices to be relevant to a surveillance system including a camera adapted to be connected to a wired IP network to output digital signals in multicast protocol, and a protocol translator adapted to translate a desired signal from multicast protocol to unicast protocol and to forward the desired signal in unicast protocol to a wireless transmitting device as specified in claim 1 as amended.

Third, even if Li '279 were combined with the three other references, the combination would be inoperative. Applicants respectfully submit that it is unclear how a system

based upon Courtney '772 would possibly incorporate the transcoding of web pages to be displayed on different devices as described in Li '279.

Fourth, Applicants submit that even if Li '279 were combined with a system based upon Courtney '772, the combination simply does not provide a digital multicast signal output from a video camera or a protocol translator adapted to translate a desired signal from multicast format to unicast format and to forward the desired signal in unicast format to a wireless transmitting device.

In view of the foregoing, Applicants submit that claims 3-7 and 31 are allowable over the cited combination of references for the reasons set forth. Applicants also submit that these claims are allowable because they are dependent upon claim 1, which is allowable for the reasons previously set forth herein, and further in view of the additional subject matter recited in claims 3-7 and 31.

**IV. The Examiner rejected claims 15-19 under 35 U.S.C. 103 as being unpatentable over Courtney '772 and Hendricks '386 in view of Shinsky '398.**

Applicants respectfully submit that claims 15-19 are dependent upon claim 1 and are allowable for the reasons set forth regarding claim 1, and further in view of the additional subject matter therein.

**V. The Examiner rejected claim 20 under 35 U.S.C. 103 as being unpatentable over Courtney '772 and Hendricks '386 in view of Glatt.**

Applicants respectfully submit that claim 20 is dependent upon claim 1 and is allowable for the reasons set forth regarding claim 1, and further in view of the additional subject matter recited therein.

**VI. The Examiner rejected claims 25-27, 29 and 30 under 35 U.S.C. 103 as being unpatentable over Courtney '772 and Hendricks '386 in view of Ogasawara '919.**

Applicants respectfully submit that claims 25-27, 29 and 30 are dependent upon claim 1 and are allowable for the reasons set forth regarding claim 1, and further in view of the additional subject matter recited therein.

**VII. The Examiner rejected claims 32-34 under 35 U.S.C. 103 as being unpatentable over Courtney '772, Hendricks '386, Li and Morad in view of Patent Publication 2001/0005684 to Inken.**

Applicants respectfully submit that claims 32-34 are dependent upon claim 1 and are allowable for the reasons set forth regarding claim 1, and further in view of the additional subject matter recited therein.

**VIII. The Examiner rejected claims 35-41 under 35 U.S.C. 103 as being unpatentable over Courtney '772, Hendricks '386, Li and Morad in view of Patent Publication 2001/0026223 to Menard.**

Applicants respectfully submit that claims 35-41 are dependent upon claim 1 and are allowable for the reasons set forth regarding claim 1, and further in view of the additional subject matter recited therein.

**Conclusion**

In view of the foregoing, Applicants respectfully submit that claims 1-41 as amended and new claims 45-46 distinguish over the cited references and are in condition for allowance. Applicants respectfully request that this Response be considered by the Examiner and a Notice of Allowance be entered.

Respectfully submitted,

  
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